

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

MACKENZIE HILL,

*Plaintiff,*

v.

UNIFI AVIATION, LLC and  
THE ESTATE OF DAVID RENNER,

*Defendants.*

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CIVIL ACTION NO. 23-CV-00970

**DEFENDANT UNIFI AVIATION, LLC'S**  
**SUPPLEMENT TO ITS NOTICE OF REMOVAL**

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant Unifi Aviation, LLC (“Unifi”), pursuant to the Court’s *Standing Order in Civil Cases Assigned to Judge Jason Pulliam* [Doc. 2] (the “Standing Order”), files this Supplement to its Notice of Removal filed August 8, 2023 [Doc. 1]. Specifically, this Supplement (a) confirms and clarifies the parties’ citizenship under Part 4 of the Standing Order (addressing federal jurisdiction in diversity cases), and (b) includes updated filings from the state court action under Part 5 of the Standing Order (addressing removed cases).

1. In Unifi’s Notice of Removal, which removed this lawsuit to federal court on the basis of diversity, Unifi stated that at the time of removal, “Plaintiff was a resident of and domiciled in Texas.” Notice of Removal at ¶ 4. “For individuals, ‘citizenship has the same meaning as domicile.’” *MidCap Media Fin., L.L.C. v. Pathway Data, Inc.*, 929 F.3d 310, 313 (5th Cir. 2019) (quoting *Stine v. Moore*, 213 F.2d 446, 448 (5th Cir. 1954)). Pursuant to Part 4(a) of the Standing Order—which states that for individuals “pleading residence is insufficient” and the “notice of

removal must plead their citizenship”—Unifi states that the sole Plaintiff in this case, Mackenzie Hill, is a citizen of Texas.

2. Further, Unifi states the following with respect to the individuals whose citizenship implicates the citizenship of Unifi: (a) Frank A. Argenbright, Jr. is a citizen of Florida (*see* Notice of Removal at ¶ 13); (b) Karan Ishwar is a citizen of Georgia (*see id.* at ¶¶ 14 and 15); Sarah B. Argenbright is a citizen of Georgia (*see id.* at ¶ 14); and (d) Hunter B. Argenbright is a citizen of New York (*see id.* at ¶ 15).

3. In sum, Plaintiff is a citizen of Texas; and Unifi is a citizen of Delaware, Florida, Georgia, Nevada, and New York. *Id.* at ¶ 16. Thus, complete diversity exists between the proper parties to this lawsuit. *Id.* at ¶ 18.

4. Pursuant to Section 5(a) of the Standing Order, Unifi has attached to this Supplement (as **Exhibit A**) an updated docket sheet from the state court action showing the filings of Unifi’s Answer and Notice to State Court of Removal. Copies of Unifi’s *Original Answer* and *Notice to State Court of Removal to Federal Court* are also attached as **Exhibit B** and **Exhibit C**, respectively. The latter two documents were previously provided with Unifi’s Notice of Removal, but had not yet been file-marked by the state court. The versions attached here are identical in all respects to those previously filed except that they are now file-marked.

Respectfully submitted,

/s/ Stuart B. Brown, Jr.

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 10, 2023, a copy of the foregoing document was filed electronically using the Court's Electronic Case Filing System. Notice of this filing will be sent electronically to counsel of record using the Court's electronic notification system. Parties may access this filing through the Court's Electronic Case Filing System.

/s/ Stuart B. Brown, Jr.

Stuart B. Brown, Jr.